

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

ADA MORALES,	:	
	:	
Plaintiff,	:	
	:	
v.	:	CIVIL ACTION
	:	
BRUCE CHADBOURNE,	:	No. 12-cv-00301-M-DLM
et al.,	:	
	:	
Defendants.	:	

**PLAINTIFF'S COMBINED MOTION
FOR SUMMARY JUDGMENT AGAINST THE FEDERAL DEFENDANTS
AND OPPOSITION TO THE FEDERAL DEFENDANTS'
SUMMARY JUDGMENT MOTION**

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, Plaintiff Ada Morales hereby moves for Summary Judgment against the United States, ICE Agent Edward Donaghy, and ICE Field Office Director Bruce Chadbourne (collectively, “the federal defendants”). Ms. Morales also opposes the federal defendants’ motion for summary judgment (Dkt. No. 157). In support of both her affirmative motion and her opposition, Ms. Morales submits the accompanying memorandum of law.

For the reasons explained in the accompanying memorandum, Ms. Morales is entitled to summary judgment on all her remaining claims against the federal defendants: i.e., her Fourth Amendment claims against Defendants Donaghy and Chadbourne, and her false imprisonment and negligence claims against the United States. She opposes the federal defendants’ motion for summary judgment as to these same claims.¹

¹ The federal defendants have not sought summary judgment as to Ms. Morales’s entitlement to injunctive relief. Ms. Morales also does not affirmatively seek summary judgment as to injunctive relief.

Concurrently with this motion, Ms. Morales is filing a Statement of Disputed Facts responding to the federal defendants' Statement of Undisputed Facts (Dkt. No. 157-2), as well as her own Statement of Undisputed Facts in support of her summary judgment motions against both federal defendants and Defendant A.T. Wall.²

WHEREFORE, Ms. Morales respectfully opposes the federal defendants' motion for summary judgment and requests that her motion for summary judgment be granted.

Dated: November 13, 2015

Respectfully submitted,

By: /s/ Katherine Desormeau
Laura Donovan (No. 8333)
Mark A. Ford (*pro hac vice*)
Margaret E. O'Grady (*pro hac vice*)
Mi Hyun Yoon (*pro hac vice*)
WILMER CUTLER PICKERING HALE
AND DORR LLP
60 State Street
Boston, MA 02109
Tel.: (617) 526-6000
Fax: (617) 526-5000
Mark.Ford@wilmerhale.com
Margaret.O'Grady@wilmerhale.com
Angela.Yoon@wilmerhale.com

Katherine Desormeau (*pro hac vice*)
ACLU FOUNDATION IMMIGRANTS'
RIGHTS PROJECT
39 Drumm Street
San Francisco, CA 94111
Tel.: (415) 343-0778
Fax: (415) 395-0950
KDesormeau@aclu.org

Attorneys for Plaintiff
Ada Morales

² Ms. Morales's claims against Defendant Wall are addressed in a separate motion and memorandum of law.